

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CAROLYN GARDNER**

Plaintiff

v.

**KUTZTOWN UNIVERSITY, *et al.***

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CIVIL ACTION

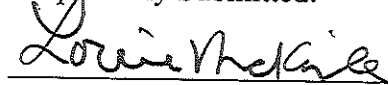
NO. 22-1034

**PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING ORDER  
AND/OR PRELIMINARY EMERGENCY RELIEF**

For all the reasons set forth in the accompanying Memorandum of Law, Carolyn Gardner, through her undersigned counsel, respectfully requests that the Court enter a Temporary Restraining Order and/or other Preliminary Injunctive Relief against Kutztown University, and the individual defendants, Kenneth S. Hawkinson, Jesus Peña, and Jennifer Weidman, requiring them to restore her to full active duty employment as Associate Professor of Business Administration with a remote work accommodation for all of her scheduled classes for the 2022 fall semester in full accordance with Section 504 of the Rehabilitation Act, 29 U.S.C. §794.

Respectfully Submitted:

By:



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*Attorneys for Plaintiff Carolyn Gardner*

DATE: August 17, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, August 17, 2022, a true and correct copy of the foregoing Plaintiff's Motion for a Temporary Restraining Order and/or Preliminary Emergency Relief was served upon counsel by way of the Court's ECF system as follows:

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Pennsylvania Office of Attorney General  
Eastern Regional Office, Civil Litigation Section  
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LORRIE MCKINLEY, ESQUIRE